

**DEFENDANTS SIMON WIESENTHAL CENTER AND RABBI ABRAHAM COOPER'S**  
**NOTICE OF MOTION AND MOTION TO DISMISS COUNTS 8-10 IN PLAINTIFFS'**  
**FIRST AMENDED COMPLAINT PURSUANT TO FED. R. CIV. P. 12(b)(6)**

**NOTICE OF MOTION AND MOTION**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and the supporting Declaration of Julie R. Gerchik, dated December 12, 2023, with exhibits thereto, Defendants Simon Wiesenthal Center and Rabbi Abraham Cooper, individually and in his official capacity as Director of Global Social Action Agenda for the Simon Wiesenthal Center (“Defendants”), will and hereby do move the Court for an order dismissing Counts 8-10 in Plaintiffs’ Minister Louis Farrakhan and The Nation Of Islam (“Plaintiffs”) First Amended Complaint for Violation of Constitutionally Protected Rights, Defamation, and Declaratory Relief filed on November 2, 2023 pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

Dated: December 12, 2023

Respectfully submitted,

By: /s/ Julie R. Gerchik

Patricia L. Glaser (admitted *pro hac vice*)

Julie R. Gerchik (admitted *pro hac vice*)

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